IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

William S. Drake and Andrea K. Drake,	§ §	
Plaintiffs,	§	
,	§	(IN RE MDL 2197)
VS.	§	Case No.: 13-dp-20140
	§	
DePuy Orthopaedics, Inc., DePuy,	§	
Inc., DePuy International Limited,	§	
Johnson & Johnson, Johnson & Johnson	§	
Services Inc., and Johnson & Johnson	§	
International,	§	
Defendants.	§	

DECLARATION OF JENNIFER M. ANDREWS SUBJECT TO SPECIAL APPEARANCE

Subject to previously filed Special Appearance and without waiving same, BEFORE ME, the undersigned authority, on this day personally appeared Jennifer M. Andrews, known to me to be the person whose name is subscribed below, and having first been duly sworn by me upon oath under penalty of perjury deposed and said:

- 1. My name is Jennifer M. Andrews. I am over the age of eighteen (18) and other wise competent to make this declaration. All statements contained in this declaration and Johnson's Special Appearance are within my personal knowledge and are true and correct, and are made subject to Johnson's Special Appearance.
- 2. I am the lead attorney of record for Steven M. Johnson ("Johnson"). I am licensed to practice law in Texas and my license is in good standing. I represent Johnson in an arbitration proceeding between Johnson and William "Scott" Drake ("Drake"), which has now been concluded by Judicial Arbitration and Mediation Services in Dallas, Texas, JAMS Ref. No. 1310021501.

3. The Exhibits to Johnson's Special Appearance and Response subject thereto to Drake's "Motion to Enforce Master Settlement Agreement and Vacate Arbitration Award" and Memorandum of Law filed in support of same are true and correct copies of the documents, and events represented by such documents:

Exhibit A: The Corrected Final Award dated 7/7/2016;

Exhibit B: The Contract between Drake and Johnson dated 1/30/2012;

Exhibit C: Order No. 1 of Special Master Yanni in JAMS Ref. No. 1200048059;

Exhibit D: Order of Special Master Yanni in JAMS Ref. No. 1200048059 determining that she

does not have jurisdiction of the second arbitration proceeding filed by Drake or on

his behalf;

Exhibit E: Certificate of Service filed in this proceeding;

Exhibit F: Excerpts of the DePuy Hip ASR Master Settlement Agreement;

Exhibit G: William "Scott" Drake and Andrea Drake's DePuy Hip ASR Release, signed

4/13/15;

Exhibit H: Email trail in JAMS Ref. 1310021509 dated 2/12/2016 and 2/16/2106;

Exhibit I: Email trail in JAMS Ref. 1310021509 dated 3/31/2016;

Exhibit J: Excerpts of arbitration hearings dated 4/4/2016; 5/9/2016; 5/10/2016;

Exhibit K: Application to Confirm Domestic Arbitration Award, Memorandum of Law in

support, Appendix in Cause no. 3:16-cv-01993-L filed on July 7, 2016;

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Exhibit L: Certificate of Service on William "Scott" Drake in Cause no. 3:16-cv-01993-L, Northern District of Texas, Dallas Division.

Jennifer M., Andrews

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on the 25th day of July 2016 to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

My Commission Expires:

9-27-16

